

EXHIBIT E

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Dies & Hile Claimants hereby incorporate by reference all fact witnesses listed on Exhibit "D" and in addition would preliminarily designate the following individuals and/or representatives:

1. J.P. Bolduc, Former President and Chief Executive Officer of W.R. Grace & Co., One Town Center Road, Baco Raton, Florida 33486-1010.
2. R. Jeff Carlisle, Attorney, Lynberg & Watkins, Sixteenth Floor, International Tower Plaza, 888 South Figueroa Street, Los Angeles, California 90017-2516.
3. Joseph P. DeAllessandro, Chairman, President and CEO of DeAllessandro & Associates, Inc., a PRIMERICA Company, 65 East 55th Street, New York, New York 10022.
4. O. Mario Favorito, Former General Counsel, W.R. Grace & Co., One Town Center Road, Baco Raton, Florida 33486-1010.
5. Dennis J. Fichtel, CPCU, Senior Claims Manager, Corporate Risk Management, W.R. Grace & Co., One Town Center Road, Boca Raton, Florida 33486-1010.
6. Ray Gerepka, Home Office Supervisor, Toxic Tort Claims Department, American International Adjustment Company, Inc., 80 Pine Street, New York, New York 10005.
7. Jay W. Hughes, Jr., Senior Litigation Counsel, W.R. Grace & Co., One Town Center Road, Baco Raton, Florida 33486-1010.
8. Robert B. Lamm, Former Secretary of the Board of Directors of W.R. Grace & Co., One Town Center Road, Baco Raton, Florida 33486-1010.
9. George S. Moore, Former Director Emeritus of W.R. Grace & Co., One Town Center Road, Baco Raton, Florida 33486-1010.
10. Jeffrey R. Posner, Former Assistant Vice President and Director of Corporate Risk Management of W.R. Grace & Co., One Town Center Road, Boca Raton, Florida 33486-1010.
11. David Siegel, Former General Counsel, now Consultant, W.R. Grace & Co., and now, Consultant, W.R. Grace & Co., One Town Center Road, Baco Raton, Florida 33486-1010.
12. Brian J. Smith, Former Executive Vice President of the Board of Directors and Chief Financial Officer of W.R. Grace & Co., One Town Center Road, Baco Raton, Florida 33486-1010.

13. George Vallone, American International Group Companies, 80 Pine Street, New York, New York 10270.

14. Robert C. Walsh, former Grace representative. Address presently unknown.

15. Joseph R. Wright, Jr., Former Vice Chairman of W.R. Grace & Co., One Town Center Road, Boca Raton, Florida 33486-1010.

16. Representatives of AIG Insurance Companies, 80 Pine Street, New York, New York 10270 (Grace insurer).

17. Representatives of AIU/Granite State Insurance Company, 70 Pine Street, New York, New York 10270 (Grace insurer).

18. Representatives of American Home Assurance Company (Grace insurer).

19. Representatives of American International Adjustment Co., Inc., 80 Pine Street, Sixth Floor, New York, New York 10005 (Grace insurer).

20. Representatives of Birmingham Fire Insurance Company (Grace insurer).

21. Representatives of Illinois National Insurance Company (Grace insurer).

22. Representatives of Insurance Company of the State of Pennsylvania (Grace insurer).

23. Representatives of Lexington Insurance Company, 200 State Street, Boston, Massachusetts 02109 (Grace insurer).

24. Representatives of Maryland Casualty Insurance Companies (Grace insurer).

25. Robert J. Berttacchi, former Grace employee. Address currently unknown.

26. George Blackwood, Former Director Emeritus, W.R. Grace & Co., One Town Center Road, Boca Raton, Florida 33486-1010. Deposition taken on December 19, 1985 in connection with *The Corporation of Mercer University v. National Gypsum Co., et al.*, No. 85-126-3-MAC (M.D. Ga. 1986); and Deposition taken on January 14, 1986 in connection with *The Corporation of Mercer University v. National Gypsum Co., et al.*, No. 85-126-3-MAC (M.D. Ga. 1986).

27. Thomas Cheatham, former Grace employee. Deposition taken on December 12, 1991 in connection with *Dayton Independent School District, et al. v. U.S. Mineral Products Co., et al.*, ("Dayton II"), No. B-87-00507-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division; and Deposition taken on January 21, 1992 in connection with *Dayton Independent School District, et al. v. U.S. Mineral Products Co., et al.*,

("Dayton II"), No. B-87-00507-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division.

28. James Cintani, Grace employee. Deposition taken on August 4, 1987 in connection with *Clemson University and The College of Charleston v. W.R. Grace, et al.*, No. 2:86-2055-2, United States District Court, District of South Carolina, Charleston Division; Deposition taken on November 23, 1987 in connection with *City of Boston, et al. v. Keene Corporation, et al.*, No. 82254, Commonwealth of Massachusetts, Suffolk, SS; Deposition taken on March 18, 1988 in connection with *Max G. Williams and Maureen D. Williams v. National Gypsum Company, et al.*, No. 86-0714, in the United States District Court for the District of Nebraska; and Deposition taken on January 13, 1989 in connection with *3250 Wilshire Boulevard Building, et al. v. Metropolitan Life Insurance Company, et al.*, No. 87-06048 WMB (GHKx), in the United States District Court for the Central District of California.

29. Albert J. Costello, former Grace employee and/or officer. Address currently unknown.

30. Bradley Dewey, former Director of Grace. Deposition taken on September 17, 1996 in connection with *The Port Authority of New York and New Jersey (formerly known as "The Port of New York Authority") and Port Authority Trans-Hudson Corporation v. Allied Corporation (individually and as a subsidiary of "Allied-Signal Inc."), et al.*, No. 91 Civ. 0310 (CLB) (MDF), in the United States District Court in the Southern District of New York.

31. Frederick W. Eaton, Grace employee. Deposition taken on October 21-22, 1986 in connection with *Dayton Independent School District, et al. v. W.R. Grace & Co., et al.* ("Dayton I"), No. B-81-277-CA Consolidated with No. B-81-293-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division.

32. Robert C. Ericson, Grace employee. Deposition taken on January 24-25, 1986 in connection with *The Corporation of Mercer University v. National Gypsum Co., et al.*, No. 85-126-3-MAC (M.D. Ga. 1986); and Deposition taken on December 2, 1988 in connection with *3250 Wilshire Boulevard Building, et al. v. Metropolitan Life Insurance Company, et al.*, No. 87-06048 WMB (GHKx), in the United States District Court for the Central District of California.

33. Henry A. Eschenbach, Grace employee. Deposition taken on January 17, 1986 in connection with *The Corporation of Mercer University v. National Gypsum Co., et al.*, No. 85-126-3-MAC (M.D. Ga. 1986); and Deposition taken on June 20, 1986 and August 7, 1986 in connection with *School District of Independence, Missouri, No. 30 v. United States Gypsum Company, et al.*, No. CV84-05334, in the Circuit Court of Jackson County, Missouri.

34. Jack Hughes, Grace employee or representative. Current address unknown.

35. John B. Lyall, Grace representative. Deposition taken on January 28, 1992 in connection with *Dayton Independent School District, et al. v. U.S. Mineral Products Co., et al.*, ("Dayton II"), No. B-87-00507-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division.

36. Ralph McLeod, Grace representative. Deposition taken on January 21, 1992 in connection with *Dayton Independent School District, et al. v. U.S. Mineral Products Co., et al.*, (“*Dayton IF*”), No. B-87-00507-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division.

37. Carrol Hall Wendel, Grace representative. Deposition taken on July 14, 1989 in connection with *3250 Wilshire Boulevard Building, et al. v. Metropolitan Life Insurance Company, et al.*, No. 87-06048 WMB (GHKx), in the United States District Court for the Central District of California.

38. Ernest Sumruld. Deposition taken in connection with *Dayton Independent School District, et al. v. U.S. Mineral Products Co., et al.*, (“*Dayton IF*”), No. B-87-00507-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division.

39. Albert B. Knudsen. Deposition taken in connection with *Dayton Independent School District, et al. v. U.S. Mineral Products Co., et al.*, (“*Dayton IF*”), No. B-87-00507-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division.

40. Herbert Levine. Deposition taken in connection with *Dayton Independent School District, et al. v. U.S. Mineral Products Co., et al.*, (“*Dayton IF*”), No. B-87-00507-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division.

41. James P. Verhalen. Deposition taken in connection with *Dayton Independent School District, et al. v. U.S. Mineral Products Co., et al.*, (“*Dayton IF*”), No. B-87-00507-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division.

42. Jack Corgan. Deposition taken in connection with *Dayton Independent School District, et al. v. U.S. Mineral Products Co., et al.*, (“*Dayton IF*”), No. B-87-00507-CA, in the United States District Court for the Eastern District of Texas, Beaumont Division.